

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

2023 MAY 25 PM 1:31

CLERK

BY 
DEPUTY CLERK

Adam Jankowski

Plaintiff(s),

v.

Centurion of Vermont, LLC, et al.

Defendant(s).

Case No. 2:22-CV-169-kjd

AMENDED STIPULATED DISCOVERY SCHEDULE/ORDER

The parties submit the following Discovery Schedule pursuant to Local Rule 26(a)(2):

INTRODUCTION

1. In this case, discovery may be needed on the following subjects:

All Claims

Unless noted here to the contrary and in more detail, discovery in this matter shall not be conducted in phases or limited to particular, enumerated issues.

2. The parties have conferred about disclosure, discovery, and preservation of electronically stored information ("ESI"). Unless noted otherwise, ESI shall be produced in the following format(s): PDF or native format.
3. The parties have conferred about claims of privilege and claims of protection as trial-preparation materials. The parties have agreed on the following procedure to assert these claims after production: priviledge log . Unless specifically requested in a filing with this court, the parties agreed procedure will not be the subject of a court order under Federal Rule of Evidence 502.
4. Any changes in the limitations on discovery imposed under the Federal Rules of Civil

Procedure or the Local Rules for this District shall be specifically described below.

DEADLINES

5. The parties shall serve initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before April 19, 2023.
6. The parties shall serve all interrogatories and requests for production on or before July 10, 2023.
7. Depositions of all non-expert witnesses shall be completed by 7/31/2023.
8. Plaintiff shall submit expert witness reports on or before March 6, 2023. Depositions of plaintiff=s expert witnesses shall be completed by 6/6/2023.
9. Defendant shall submit expert witness reports on or before 6/16/2023. Depositions of defendant=s expert witnesses shall be completed by 8/15/2023. Rebuttal Report (if any) August 15, 2023
10. The Early Neutral Evaluation session shall be conducted on 8/15/2023 at Click here to enter time ☐ am ☐ pm. The parties have agreed that Click here to enter evaluator's name will serve as the early neutral evaluator. (Note: Paragraph 10 only applies to ENE-eligible cases pursuant to Local Rule No. 16.1.)
11. The parties shall serve all requests for admission on or before 8/28/2023.
12. All discovery shall be completed by 9/28/2023 (no later than 8 months after filing of the Answer or Third-Party Answer).
13. Motions for joinder of parties and amendments to the pleadings shall be filed on or before July 10, 2023.
14. Motions, including summary judgment motions but excluding motions relating to the conduct of the trial, shall be filed on or before September 28, 2023.
15. This case shall be ready for trial by September 28, 2023.

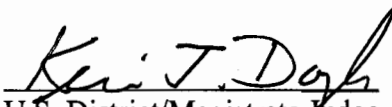
5/23/2023 /s/ Zachary Hozid
Date

Counsel for Plaintiff(s)

5/23/2023 /s/ Pamela L.P. Eaton
Date

Counsel for Defendant(s)

APPROVED and SO ORDERED:


U.S. District/Magistrate Judge

Date: May 25, 2023

Local Form/Rule 26(a)(3)